

# EXHIBIT

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Declaration of Peter C. Salerno  
In Support of Defendant Yassin Kadi's Motion  
To Exclude the Testimony of Victor Comras

03 MDL 1570

July 31, 2023



## U.S. DEPARTMENT OF THE TREASURY

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## United States Designates bin Laden Loyalist

2/24/2004

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JS-1190

The Treasury Department today announced that Shaykh Abd-al-Majid AL-ZINDANI, a loyalist to Usama bin Laden and supporter of al-Qaeda, has been designated by the United States as a Specially Designated Global Terrorist under the authority of Executive Order 13224 and the International Emergency Economic Powers Act. His name will be submitted to the UN Security Council's 1267 Committee's consolidated list because of his support to bin Laden and al-Qaeda.

"With this action, the international community's drumbeat against terrorist financiers continues to grow louder and the financial noose around al-Qaeda continues to grow tighter," said Juan Zarate, Deputy Assistant Secretary for Terrorist Financing and Financial Crime.

The U.S. has credible evidence that AL-ZINDANI, a Yemeni national, supports designated terrorists and terrorist organizations.

AL-ZINDANI has a long history of working with bin Laden, notably serving as one of his spiritual leaders. In this leadership capacity, he has been able to influence and support many terrorist causes, including actively recruiting for al-Qaeda training camps. Most recently, he played a key role in the purchase of weapons on behalf of al-Qaeda and other terrorists.

AL-ZINDANI also served as a contact for Ansar al-Islam (AI), a Kurdish-based terrorist organization linked to al-Qaeda, which is included in the UN 1267 sanctions Committee list.

AL-ZINDANI is the founder and leader of the Al Iman University in Sanaa, Yemen, which has over 5,000 enrollees. Al Iman students are suspected of being responsible, and were arrested, for recent terrorist attacks, including the assassination of three American missionaries and the assassination of the number two leader for the Yemeni Socialist party, Jarallah Omar. Notably, John Walker Lindh was also a student at Al Iman University before he joined the Taliban.

AL-ZINDANI, born circa 1950, has used the aliases Abdelmajid Al-Zindani and Shaykh Abd Al-Majid Al-Zindani. He holds a Yemen passport, no. A005487, which was issued on August 13, 1995.

Executive Order 13224 provides means to disrupt the support network that funds terrorism. Under this order, the United States government may block the assets of individuals and entities providing support, financial or otherwise, to designated terrorists and terrorist organizations. Blocking actions are critical to combating the financing of terrorism.

When a blocking action is put into place, any assets that exist in the formal financial system at the time of the orders are frozen. Blocking actions serve additional functions as well, e.g., they act as a deterrence for non-designated parties who might otherwise be willing to finance terrorist activity; expose terrorist financing "money trails" that may generate leads to previously unknown terrorist cells and financiers; disrupt terrorist financing networks by encouraging designated terrorist supporters to disassociate themselves from terrorist activity and renounce their affiliation with terrorist groups; terminate terrorist cash flows by shutting down the pipelines used to move terrorist-related assets; force terrorist to use alternative, more costly, and higher-risk means of financing their activities; and engender international cooperation and compliance with obligations under UN Security Council Resolutions.

Designation under the UN Security Council's 1267 Committee's consolidated list will trigger international obligations on all member countries, requiring them to take steps to prevent designated individuals and entities from continuing to fund or otherwise support terrorism. It is also a critical action to publicly identify these supporters of terrorism, providing warning to other entities that they are prohibited from doing business with them.

The Treasury Department is committed to stopping terrorism by taking action against those who fund it. With this designation, 351 individuals and entities will have been designated under President Bush's Executive Order aimed at freezing the assets of terrorists and their supporters – Executive Order 13224. At least \$139 million in assets has been kept out of the control of terrorists as a result of efforts by the United States and its allies.

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